

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

SHANNON PEREZ, et al.

Plaintiffs

And

EDDIE BERNICE JOHNSON, SHEILA JACKSON-LEE, and ALEXANDER

CIVIL ACTION NO.  
5:11-CV-0360-OLG-JES-XR  
[Lead Case]

GREEN, MEMBERS OF THE UNITED STATES CONGRESS

And

TEXAS LEGISLATIVE BLACK  
CAUCUS, TEXAS HOUSE OF  
REPRESENTATIVES

And

TEXAS STATE CONFERENCE OF  
NAACP BRANCHES; HOWARD  
JEFFERSON, JUANITA WALLACE and  
REV. BILL LAWSON

### *Plaintiffs-Intervenors*

V.

STATE OF TEXAS, et al.

MEXICAN AMERICAN LEGISLATIVE  
CAUCUS, TEXAS HOUSE OF  
REPRESENTATIVES, (MALC)

*Plaintiffs*

and

§ CIVIL ACTION NO.  
§ 5:11-CV-00361-OLG-JES-XR  
§ [Consolidated Case]

THE HONORABLE HENRY CUELLAR.

Member of Congress, CD28; THE TEXAS  
DEMOCRATIC PARTY and BOYD  
RICHIE, in his official capacity as Chair of  
the Texas Democratic Party; and LEAGUE  
OF UNITED LATIN AMERICAN  
CITIZENS (LULAC) and its individually  
named members

*Plaintiff-Intervenors*

v.

STATE OF TEXAS, *et al.*,

*Defendants*

---

TEXAS LATINO REDISTRICTING  
TASK FORCE, *et al.*,

*Plaintiff*

v.

RICK PERRY, In His Official Capacity  
as Governor of the State of Texas,

*Defendant*

---

MARGARITA V. QUESADA; ROMEO  
MUNOZ; MARC VEASEY; JANE  
HAMILTON; LYMAN KING; and JOHN  
JENKINS

*Plaintiffs*

v.

RICK PERRY, in his official capacity as  
Governor of the State of Texas, and HOPE  
ANDRADE, in her official capacity as  
Secretary of State of the State of Texas

*Defendants*

---

CIVIL ACTION NO.

5:11-CV-0490-OLG-JES-XR

[Consolidated Case]

CIVIL ACTION NO.

SA-11-CA-592-OLG-JES-XR

[Consolidated case]

JOHN T. MORRIS

*Plaintiff*

v.

STATE OF TEXAS, et al.

*Defendants*

EDDIE RODRIGUEZ, MILTON GERARD  
WASHINGTON, BRUCE ELFANT, ALEX  
SERNA, SANDRA SERNA, BETTY F.  
LOPEZ, DAVID GONZALEZ, BEATRICE  
SALOMA, LIONOR SOROLA-  
POHLMAN; ELIZA ALVARADO;  
JUANITA VALDEZ-COX; JOSEY  
MARTINEZ; NINA JO BAKER; TRAVIS  
COUNTY and CITY OF AUSTIN,

*Plaintiffs*

v.

STATE OF TEXAS, et al

*Defendants*

§

§

§ CIVIL ACTION NO.

§ SA-11-CA-615-OLG-JES-XR

§ [Consolidated Case]

§

§

§

§

§

§

§

§

§ CIVIL ACTION NO.

§ SA-11-CA-635-OLG-JES-XR

§ [Consolidated case]

§

§

§

§

§

§

§

### **PLAINTIFFS' PRETRIAL DISCLOSURES**

Plaintiffs Shannon Perez, Harold Dutton, Jr., Gregory Tamez, Sergio Salinas, Carmen Rodriguez, Rudolfo Ortiz, Nancy Hall and Dorothy DeBose (collectively "Perez Plaintiffs") make these pretrial disclosures as required by order of this Court.

#### **A. Witnesses**

The following list identifies all potential trial witnesses known at this time. As to the Plaintiffs with exception of Harold Dutton, we would not plan to call them assuming the parties can resolve any issues of standing.

Harold Dutton, Jr.  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701

Plaintiff

Shannon Perez  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Gregory Tamez  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Sergio Salinas  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Carmen Rodriguez  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Rudolfo Ortiz  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Nancy Hall  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Dorothy DeBose  
c/o David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701  
Plaintiff

Hubert Vo  
Room E2.208, Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

Jessica Farrar  
Room CAP 4N.07, Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

Rogene Gee Calvert  
Address will be supplied  
832-723-4508

Sarah Winkler  
Address will be supplied  
281-732-9772

Armando Walle  
Room EXT E1.220, Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

The above potential witnesses, including Harold Dutton, Jr. may testify as to political participation in Harris, Dallas, El Paso, Tarrant, Hidalgo, and Nueces counties and adjoining area, including participation of minority communities and implications of the recently enacted redistricting plans and alternative plans as to that participation. They may also testify as to the failure to properly recognize minority growth in the plans and failure to draw appropriate minority districts under controlling legal precedent. In addition, they may testify regarding the existence of political and racial gerrymander in the House plan accompanied by impermissible population deviation among the districts.

Harold Dutton, Jr. will also testify as to his activities in legislation on prison issue and the implications on redistricting of the treatment of prison population and resulting violation of one person one vote.

Ed Martin  
100 Pony Chase  
Austin, Texas 78727

The above witness may testify as to political participation in Texas and in the counties in Harris, Dallas, El Paso, Tarrant, Hidalgo, Nueces and adjoining areas, including participation of the minority communities and the implications of the recently enacted redistricting plans upon the effective participation of those communities. He may testify as to the plans' failures to properly recognize minority growth and failure to draw appropriate minority opportunity districts. He may also testify as to alternative redistricting plans for the affected areas.

Eliot Shapleigh  
701 N. Saint Vrain  
El Paso, Texas 79902  
915-542-1983

The above potential witness, Eliot Shapleigh may testify as to political participation in El Paso County and adjoining area, including participation of minority communities and implications of the recently enacted redistricting plans and alternative plans as to the participation. Also, they may testify as to the failure to properly recognize minority growth in the plans and failure to draw appropriate minority districts under controlling legal precedent.

Marc Veasey  
Room EXT E2.806, Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

Roberto Alonzo  
Room CAP 4N.6, Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

The above potential witnesses, Marc Veasey and Roberto Alonzo may testify as to political participation in Dallas and Tarrant Counties and adjoining area, including participation of minority communities and implications of the recently enacted redistricting plans and alternative plans as to that participation. Further, they will testify regarding the failure to properly recognize minority growth in the plans and failure to draw appropriate minority districts under controlling legal precedent. In addition, they will testify as to the existence of political gerrymander in the House plan for Dallas County accompanied by impermissible population deviation among the districts.

Pete Gallego  
Room CAP 4N.9 Capitol Extension  
P.O. Box 2910  
Austin, Texas 78768

The above witness may testify as to minority participation in the electoral process across the State and the implications of the presently enacted redistricting plans upon that participation as well as the availability of alternative plans that would fairly recognize that minority growth, with specific emphasis upon West Texas, South Texas and Nueces County.

Jeff Smith  
906 Rio Grande  
Austin, Texas 78701  
512-472-9772

The above witness may testify as to minority participation in the electoral process across the State and the implications of the recently enacted redistricting plans upon that participation. He may also testify as to the State's failure to properly recognize minority growth in these plans and failure to create appropriate minority districts for Congress under controlling legal precedent.

James Aldrete  
2400 S. 4<sup>th</sup> Street  
Austin, Texas 78701

The above witness may testify as to the minority participation in the electrical process across the State and the implications of the recently enacted redistricting plans upon that participation. He may also testify as to other State's failure to properly recognize minority growth in these plans under controlling legal precedent, with specific emphasis upon South Texas, The Rio Grande Valley, El Paso and Nueces Counties. He may also testify as to the State's failure to properly recognize minority growth in these plans and failure to create appropriate minority districts for Congress under controlling legal precedent.

Rick Gray  
Gray & Becker, P.C.  
900 West Avenue  
Austin, Texas 78701

David Richards  
Richards Rodriguez & Skeith, LLP  
816 Congress Avenue  
Austin, Texas 78701

Rick Gray and David Richards might ultimately be called as expert witnesses on attorney's fees.

**B. Depositions**

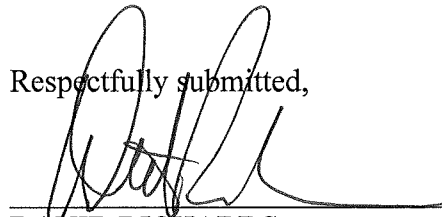
Perez Plaintiffs may expect to call some of these witnesses by deposition pending agreement with Defendants.

**C. Exhibits**

Perez Plaintiffs expect to offer the following exhibits:

1. Report by Texas Department of Criminal Justice – Offenders On Hand by Legal County of Residence – Data as of March 31, 2011
2. Report by Texas Department of Criminal Justice – Offenders On Hand by County by Unit of Assignment – Data as of March 31, 2011
3. Any and all exhibits associated with the expert designations on behalf of Perez Plaintiffs being filed this date.

Respectfully submitted,



DAVID RICHARDS  
State Bar No. 16846000  
Richards, Rodriguez & Skeith LLP  
816 Congress Avenue, Suite 1200  
Austin, Texas 78701  
Tel (512) 476-0005  
Fax (512) 476-1513

RICHARD E. GRAY, III  
State Bar No. 08328300  
Gray & Becker, P.C.  
900 West Avenue  
Austin, Texas 78701  
Tel: (512) 482-0061  
Fax: (512) 482-0924

**ATTORNEYS FOR PLAINTIFFS PEREZ,  
DUTTON, TAMEZ, HALL, ORTIZ, SALINAS,  
DEBOSE, and RODRIGUEZ**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of August, 2011, I electronically filed the foregoing using the CM/ECF system which will send notification of such filing to all counsel of record.

  
**DAVID RICHARDS**